

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

KENYON DOUGLASS,

Plaintiff,

vs.

NATIONWIDE CREDIT, INC.,

Defendant.

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**COMPLAINT**

**INTRODUCTION**

1. Plaintiff Kenyon Douglass brings this action to secure redress from unlawful credit and collection practices engaged in by defendant Nationwide Credit, Inc. Plaintiff alleges violation of the Fair Debt Collection Practices Act, 15 U.S.C. §1692 et seq. (“FDCPA”). The FDCPA broadly prohibits unfair or unconscionable collection methods; conduct which harasses, oppresses or abuses any debtor; and any false, deceptive or misleading statements, in connection with the collection of a debt; it also requires debt collectors to give debtors certain information. 15 U.S.C. §§1692d, 1692e, 1692f and 1692g.

**VENUE AND JURISDICTION**

2. This Court has jurisdiction under 15 U.S.C. §1692k (FDCPA), 28 U.S.C. §1331 and 28 U.S.C. §1337.

3. Venue and personal jurisdiction in this District are proper because:

a. Defendant’s collection communications were received by plaintiff within this District;

b. Defendant does or transacts business within this District.

**PARTIES**

4. Plaintiff Kenyon Douglass is an individual who resides in Chicago, Illinois.

5. Defendant Nationwide Credit, Inc. is a Georgia corporation with its principal

place of business at 2002 Summit Boulevard, Suite 600, Atlanta, Georgia 30319.

6. Nationwide Credit, Inc. operates a collection agency, using the mail and telephone system to collect owned to them.

7. Nationwide Credit, Inc. is a “debt collector” as defined in the FDCPA.

**FACTS**

8. On or about August 8, 2013, plaintiff filed a Chapter 7 petition. 13 B 31788.

9. Among the debts listed and discharged was a JC Penney account issued by General Electric Credit, now known as Synchrony Bank, Exhibit A.

10. Plaintiff received a discharge in April 2014. Exhibit B.

11. On or about September 9, 2014, defendant Nationwide Credit, Inc. sent plaintiff Kenyon Douglass the collection letter attached as Exhibit C, on behalf of Synchrony Bank.

12. The letter sought to collect an alleged defaulted debt incurred for personal, family or household purposes.

13. The letter sought to collect a debt that had been discharged and was not owed.

14. The discharge was a matter of public record. Furthermore, defendant could readily have ascertained its existence from a credit report or one of several services that reports bankruptcy filings to debt collectors.

15. On or about September 16, 2014, following receipt of Exhibit C, plaintiff called defendant at 866-659-0711 and informed them of her bankruptcy filing.

16. On or about October 1, 2014, a representative of defendant called plaintiff from 678-269-7504, which number is on information and belief issued to defendant.

17. During the call on or about October 1, 2014, plaintiff once again informed defendant of her bankruptcy filing and requested that they cease contacting her.

**VIOLATION COMPLAINED OF**

18. Exhibit C violates 15 U.S.C. §1692e, by representing that plaintiff owed a debt she did not owe.

WHEREFORE, the Court should enter judgment in favor of plaintiff and against defendant for:

- (1) Statutory damages;
- (2) Attorney's fees, litigation expenses and costs of suit;
- (3) Such other and further relief as the Court deems proper.

s/Daniel A. Edelman

Daniel A. Edelman  
Michelle R. Teggelaar  
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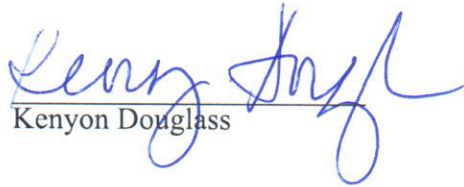
**JURY DEMAND**

Plaintiff demands trial by jury.

s/Daniel A. Edelman

**VERIFICATION**

The undersigned declares under penalty of perjury, as provided for by 28 U.S.C. §1746, that the facts stated in the foregoing complaint are true to the best of her knowledge and belief.

  
Kenyon Douglass

**NOTICE OF LIEN AND ASSIGNMENT**

Please be advised that we claim a lien upon any recovery herein for 1/3 or such amount as a court awards. All rights relating to attorney's fees have been assigned to counsel.

s/Daniel A. Edelman

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